

Cozen O'Connor
Attorneys for Plaintiffs
Peter G. Rossi, Esquire (PGR-8516)
45 Broadway, 16th Floor
New York, New York 10006
(212) 509-9400

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

-----X
ATLANTIC SPECIALTY INSURANCE COMPANY,
as subrogee of Brant Publications and
The Solomon R. Guggenheim Foundation

CIVIL ACTION NO.
1:07-cv-8508 BSJ

and

NATIONAL SURETY CORPORATION,
as subrogee of Peter Brant

and

142 MERCER STREET, LLC d/b/a LURE FISH BAR

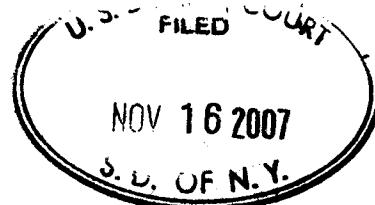
Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

PLAINTIFFS' MOTION
TO ADMIT COUNSEL
PRO HAC VICE



PURSUANT TO RULE 1.3(c) of the Local Rules of the United States District Courts for the Southern and Eastern Districts of New York, I, Peter G. Rossi, a member in good standing of the bar of this Court, hereby move for an Order allowing the admission pro hac vice of Paul R. Bartolacci, Esquire, Cozen O'Connor, 1900 Market Street, Philadelphia, PA 19103, phone no. 215-665-2001, fax no. 215-665-2013, e-mail: pbartolacci@cozen.com.

Paul R. Bartolacci is a member in good standing of the Bar of the Commonwealth of Pennsylvania. There are no pending disciplinary proceedings against Paul R. Bartolacci in any State or Federal Court.

Dated: 11/17/07
New York, New York

Respectfully submitted,

COZEN O'CONNOR

BY: 
PETER G. ROSSI, ESQ. (PGR-8516)
45 Broadway, 16th Floor
New York, NY 10006
Attorneys for Plaintiffs
(212) 509-9400

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**AFFIRMATION OF
SPONSOR**

Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

-----X

PETER G. ROSSI, being duly sworn, hereby deposes and says as follows:

1. I am an attorney duly licensed to practice law in the State of New York and am a member of the law firm of Cozen O'Connor, attorneys for Plaintiffs in the above action.
2. I am fully familiar with the facts and circumstances as hereinafter set forth, and make this Affidavit in support of Plaintiffs' motion to have Paul R. Bartolacci, Esquire admitted of counsel, *Pro Hac Vice*, with respect to the above-entitled action.

3. Plaintiffs originally commenced the above-entitled action against the Defendant, AE Outfitters Retail Company, on October 2, 2007.

4. The affiant has been acting as local counsel with respect to this matter and respectfully requests that the Court allow Paul R. Bartolacci, Esquire to be admitted *Pro Hac Vice* for purposes of serving as counsel for plaintiffs.

5. The affiant knows Mr. Bartolacci to be a member in good standing of the Bar of the Commonwealth of Pennsylvania, and an excellent trial attorney who has a great deal of experience with respect to the issues being presented in the present lawsuit.

6. I respectfully submit to the Court that Mr. Bartolacci is not only an excellent attorney, but also a person whose character is unimpeachable, and who would do justice to both his client and the Bar.

7. I respectfully request that Paul R. Bartolacci, Esquire be admitted *Pro Hac Vice* in the above-entitled action to serve as counsel with respect to the prosecution of the subject claims.

WHEREFORE, it is respectfully requested that the motion to admit Paul R. Bartolacci, Esquire, pro hac vice, to represent Plaintiffs in the above-entitled action, be granted.

Dated: New York, New York
11/7 , 2007

Respectfully submitted,



PETER G. ROSSI (PGR-8516)



Supreme Court of Pennsylvania

CERTIFICATE OF GOOD STANDING

Paul Robert Bartolacci, Esq.

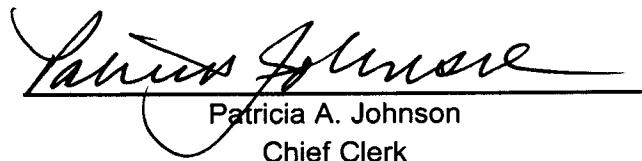
DATE OF ADMISSION

November 4, 1983

The above named attorney was duly admitted to the bar of the Commonwealth of Pennsylvania, and is now a qualified member in good standing.



Witness my hand and official seal
Dated: October 16, 2007



Patricia A. Johnson
Chief Clerk

Cozen O'Connor
Attorneys for Plaintiffs
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CIVIL ACTION NO.
1:07-cv-8508 BSJ

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142 MERCER STREET, LLC d/b/a LURE FISH BAR

ORDER

Plaintiffs,

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

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Upon the motion of Peter G. Rossi, attorney for the plaintiffs in the above-entitled action and Mr. Rossi's Affirmation in support; **IT IS HEREBY ORDERED** that

| | |
|-------------------|-----------------------------|
| Applicant's Name: | Paul R. Bartolacci, Esquire |
| Firm Name: | Cozen O'Connor |
| Address: | 1900 Market Street |
| City/State/Zip | Philadelphia, PA 19103 |
| Telephone/Fax | 215-665-2001 / 215-665-2013 |
| Email Address: | pbartolacci@cozen.com |

is admitted to practice pro hac vice as counsel for plaintiffs in the above-entitled action in the United States District Court for the Southern District of New York. All attorneys appearing before this Court are subject to the Local Rules of this Court, including the Rules governing discipline of attorneys. If this action is assigned to the Electronic Case Filing (ECF) system, counsel shall immediately apply for an ECF password at nysd.uscourts.gov. Counsel shall forward the pro hac vice fee to the Clerk of Court.

Dated:
New York, New York

United States District/Magistrate Judge

Cozen O'Connor
Attorneys for Plaintiffs
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Plaintiffs,

**CERTIFICATE OF
SERVICE**

v.

AE OUTFITTERS RETAIL COMPANY

Defendant.

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The undersigned attorney hereby certifies that the foregoing *Plaintiffs' Motion to Admit
Counsel Pro Hac Vice, Proposed Order, and Affirmation of Sponsor* were served on counsel of
record on 11/7/07, via U.S. First Class mail, postage prepaid as follows:

Robert C. Sheps, Esquire
Sheps Law Group, P.C.
35 Pinelawn Road
Suite 106 East
Melville, NY 11747



PETER G. ROSSI, ESQUIRE (PGR-8516)